

1 MARK FOWLER (Bar No. 124235)
mark.fowler@us.dlapiper.com
2 CHRISTINE K. CORBETT (Bar No. 209128)
christine.corbett@us.dlapiper.com
3 ERIK R. FUEHRER (Bar No. 252578)
erik.fuehrer@us.dlapiper.com
4 JONATHAN HICKS (Bar No. 274634)
jonathan.hicks@us.dlapiper.com
5 DLA PIPER LLP (US)
6 2000 University Avenue
7 East Palo Alto, CA 94303-2214
Tel: 650.833.2000

8 Attorneys for Defendant,
9 APPLE INC.

10

11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12

UNILOC 2017 LLC,

CASE NO. 5:19-cv-01929-EJD

13

Plaintiff,

**DECLARATION OF CHRISTINE K.
CORBETT IN SUPPORT OF DEFENDANT
APPLE INC.'S ADMINISTRATIVE
MOTION FOR RELIEF FROM
PROTECTIVE ORDER**

14

v.

15

APPLE INC.,

16

Defendant.

17

18

19

20

21

22

23

24

25

26

27

28

1 I, Christine K. Corbett, submit this declaration in support of Defendant Apple Inc.’s
2 (“Apple”) Administrative Motion for Relief from Protective Order.

3 1. I am a partner at the law firm of DLA Piper LLP (US), counsel for Defendant
4 Apple in this case. If called as a witness, I could and would testify competently to the
5 information set forth in this declaration.

6 2. In response to discovery requests and subpoenas in this case, Uniloc and third
7 parties (Pendragon Wireless LLC, d/b/a Pendrell) produced documents that it designated as
8 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the Protective Order
9 entered in this case on October 21, 2019 (Dkt. No. 65).

10 3. Apple and Intel Corporation (“Intel”) intend to file an amended complaint in *Intel*
11 *Corp. v. Fortress Investment Group, et al.*, 3:19-cv-07651-EMC (N.D. Cal.) to which Apple and
12 Intel will attach documents designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
13 ONLY” as referenced above.

14 4. Apple seeks limited relief from the protective order in the instant action to file
15 these documents under seal.

16 5. I contacted counsel for Uniloc and Pendrell on January 25, 2021 via e-mail and
17 again on January 27, 2021 via e-mail to request agreement to Apple’s disclosure of the
18 confidential information. On January 28, 2021, Aaron Jacobs on behalf of Pendrell objected to
19 Apple’s request. As of the time of filing, Uniloc did not respond to Apple’s request.

21 I declare under penalty of perjury that the foregoing is true and correct. This declaration
22 is executed on January 28, 2021, at Los Altos, California.

23 _____
24 /s/ *Christine K. Corbett*
Christine K. Corbett